



ANTI-CORRUPTION POLICY

Autopista del Guadalmedina, Concesionaria Española, S.A.

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1. PURPOSE AND SCOPE

The purpose of this anti-corruption policy is to establish guidelines for the behaviour of all personnel of Autopista del Guadalmedina, hereinafter referred to as the company, for the prevention of guidelines that may constitute a crime, that cause damage or that may damage the good image of the company.

This anti-corruption policy is applicable, from the date of entry into force, to all personnel who, directly or indirectly, work for the company or hold the capacity to represent it.

2. DEFINITIONS

Gifts or gifts of value

Anything, tangible or intangible, that has a value to the recipient of the item, such as money, discounts, loans, services, products, donations, etc.

Employee

Employee of the company, regardless of the type of contract they have.

Civil servant or public employee

Employee dependent on any of the existing public bodies in Spain (central government, autonomous communities, provincial councils or city councils) and any of the public bodies and companies dependent on them. All employees and representatives of political parties are assimilated to this category.

Supplier or subcontractor

Any provider of products or services to the company, including employees of the company.

Representative of the organization

Any person or entity that may represent the company.

3. GIFTS, INVITATIONS AND DONATIONS POLICY

3.1. GIFTS, PRESENTS, OR ACCEPTABLE PRACTICES.

Gifts or hospitality will be considered those that meet, among others, the following requirements:

- a. Are permitted by law;
- b. Are delivered or received pursuant to customary business practice or generally accepted complimentary social usage;
- c. Do not seek to affect or influence any commercial, professional or administrative relationship, or any business decision, or are linked, directly or indirectly, to unlawful acts or undue benefits;
- d. Its recipients are not public authorities or officials (or persons linked to them), with the exception of cases such as, for example, those gifts and hospitality that are protocol, courtesy, framed in institutional or socially accepted acts;
- e. Are not contrary to the values adopted by GUADALCESA in accordance with this Code of Behaviour;
- f. Do not damage the reputation and image of GUADALCESA, nor its business; and

g. Consist of objects or amenities that have a reasonable value.

3.2. GIFTS, PRESENTS, OR PROHIBITED PRACTICES.

It is expressly forbidden to give and/or receive gifts that are not contemplated in the previous section.

3.3. CHARITABLE CONTRIBUTIONS, DONATIONS AND CHARITY

Whenever possible, the Company will diversify charitable contributions, donations and charities to extend them to the majority of the population, limiting the amount of the contributions to what is approved by the company's Board of Directors.

4. CONSULTATION AND DISPUTE MANAGEMENT OFFICE

Any situation that requires consultation and/or generates doubts must be consulted with the CSR committee in advance.

Any person who wants to make a complaint of any inappropriate behaviour that they may observe, may do so through the public complaint channel (denuncias@guadalcesa.com) or directly to any of the members of the committee.

The committee must preserve the privacy and anonymity of the complainants and, if any of its members are affected by the complaint, they must not participate in the meeting in which the matter is discussed.

5. DIFFUSION AND TRAINING

This anti-corruption policy must be spread among all direct and indirect personnel of the company.

In the same way, it must be available to other interested parties through the organization's website and be provided to any person and organization that requests it.

Personnel deemed particularly sensitive by the committee, at least members of the business development, purchasing, accounting and finance, middle management and management teams, must be expressly trained in the practices permitted and prohibited by this policy.

6. COMMUNICATION CHANNELS

The anti-corruption policy will be distributed to all the organization's staff and subcontractors through the usual channels of communication transmission.

In addition, it must be made available on the organization's website and a communication campaign will be carried out upon its initial approval and each time it is modified.

7. SANCTIONS REGIME

The penalty regime established in the implementing Convention shall apply.

8. REFERENCE REGULATIONS

- *United Nations Convention against Corruption.*
- *Anti-Corruption Guidelines and Integrity in Public Enterprises, OECD.*
- *Anti-Fraud and Corruption Code, Government of Spain.*
- *Penal Code and complementary legislation, Government of Spain, updated on 13 April 2022.*